

Thomas-Jensen

Affirmation

Exhibit # 41

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK; et al.,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as
President of the United States; et al.,

Defendants.

C.A. No. 1:25-cv-00039-JJM-PAS

DECLARATION OF DR. MARICELA RAMIREZ

I, Dr. Maricela Ramirez, declare as follows:

1. I am a resident of the State of California. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the Los Angeles County Office of Education (LACOE) as Chief Education Officer.

3. LACOE is the nation's largest regional education agency, providing a range of services and programs to support Los Angeles County's 80 school districts and approximately 2 million preschool and school-age children, including Head Start, LACOE schools, and Greater Avenues for Independence (GAIN). LACOE contracts with 17 partner agencies, and LACOE's program employs approximately 2,000 people.

4. As LACOE's Chief Education Officer, I oversee programs that are funded by federal dollars, such as Head Start.

5. The federal funds allocated to LACOE's Head Start and Early Head Start Division for this program year, 2024-2025, total \$201,641,179. LACOE receives federal funds for other programs, as well.

6. The funding LACOE receives for its Head Start and Early Head Start Division serves up to 8,000 children and families from the ages of 0-5. LACOE's Head Start and Early Learning Division offers a comprehensive prenatal-to-five early learning program. We partner with families, communities, and providers to give children of all abilities the skills to succeed in school and in life.

7. LACOE's budget for this year has relied on the federal funds allocated to Head Start and Early Head Start to serve up to 8,000 students. We allocated funding for staffing, wrap around services, facilities, professional development, and other services for our students and families based on the anticipation of receiving the federal funding promised. Our agency receives an allocation each year and then we draw down on the funds as the year progresses.

8. On January 27, 2025, the acting director of the Office of Management and Budget, Matthew J. Vaeth, issued M-25-13, a "Memorandum for the Heads of Executive Departments and Agencies" regarding "Temporary Pause of Agency Grant, Loan, and Other Financial Assistance Programs" ("OMB Memorandum"). The OMB Memorandum directed all federal agencies to "pause all activities related to obligation or disbursement of all Federal financial assistance . . . including, but not limited to, financial assistance for foreign aid, nongovernmental organizations, DEI, woke gender ideology, and the green new deal," which initially, I understood would include disbursements to Head Start and Early Head Start and the entities we oversee under our current federal funding sources, described above.

9. On Tuesday, January 28th, I learned of the news of the freeze, and the website for the U.S. Department of Health and Human Services had an alert that said that there are payment delays due to the Executive Order and that they were taking extra measures. At that time, our agency was unable to draw down funds from the payment system that we requested on January 27, 2025 and this caused a lot of stress and panic for our agency.

10. When this was developing, I was at a National Head Start Association conference in Washington D.C. The National Head Start Association put out a statement sharing what they knew, that the Payment Management System appeared shut down, that the Office of Head Start was ordered not to be in communication with anyone, and that this directive impacted the entire

federal government. There was serious concern from other attendees and employees that programs would have to be shut down.

11. Even though LACOE was again able to access the system and draw down \$10,000,000 in funds, the ripple effects from the freeze for even this short time period were significant. In addition, LACOE made a second request for funds on January 29, 2025, in the amount of \$10,000,000, and LACOE has not received those funds to date.

12. LACOE staff were seriously concerned that LACOE was not going to be reimbursed because the payment system was down. Our team had to assess whether LACOE would have to shut down its programs and to determine where LACOE could find funding to pay its employees if the system continued to be down.

13. For the up to 8,000 children we serve, pauses in our federal funding can result in us failing to meet the needs of the children and their families, including disruption of mental health services, counseling, prevention, and referrals to treatment, health screenings, nutritional support services, and delay or reduced payments to staff and potential layoffs. And parents rely on our services so that they can go to work.

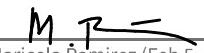
14. LACOE staff continue to be concerned that the federal funding that LACOE relies on to support children and families will again be delayed or denied because it's my understanding that the Executive Office of the President of the United States continues to share that they are still moving forward with their pause in federal funding despite the ongoing legal challenges.

15. In the next month, LACOE is scheduled to receive disbursements of approximately \$30 million under our current federal grants. These funds have been appropriated for the 2024-2025 school year but are drawn down on a monthly basis. If LACOE does not

receive such disbursements, up to 8,000 children, over 2,000 employees, and the families we serve, will be significantly harmed, including parents' ability to work.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on February 5, 2025, at Downey, CA.



Maricela Ramirez (Feb 5, 2025 10:41 PST)

Maricela Ramirez, Ed.D.
Chief Education Officer